

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JONATHAN LACY, )  
                        )  
                        )  
Plaintiff,         )      Case No.: 1:22-cv-01335  
                        )  
                        )  
v.                    )  
                        )  
COUNTY OF COOK, COOK COUNTY     )      Honorable Sara L. Ellis  
SHERIFF    THOMAS   DART,     )  
LIEUTENANT J. GUST, LIEUTENANT    )  
A.    LUPPINO,   OFFICER   A.    )  
STUBENVOLL, OFFICER T. JACKSON,   )  
OFFICER K. WOODS, OFFICER J.    )  
OLIVAS, OFFICER M. HILL, OFFICER   )  
C.    HILL,   OFFICER   G.   FLORES,   )  
OFFICER T. PRINE,   OFFICER F.    )  
HUGHES, OFFICER G. HARPER and    )  
OFFICER E. OLEA,                    )

Defendants.

**AGREED MOTION FOR ENTRY OF A QUALIFIED PROTECTIVE ORDER**

Defendants, COOK COUNTY SHERIFF THOMAS DART and COUNTY OF COOK, by and through their attorneys, DeVore Radunsky, LLC and Plaintiff, JONATHAN LACY (“LACY”), by his attorneys , Ronald Cope, Nicholas Standiford, and Emily Ottesen of Schain, Banks, Kenny & Schwartz, and pursuant to FRCP 26 (c), and 45 CFR § 160.103 and 164, move this court to enter a Qualified Protective Order:

1. According to his Amended Complaint, Lacy claims that on May 11, 2020, his constitutional rights were violated and he suffered various medical injuries while housed at the Cook County Jail in 2020.
2. This discovery is expected to include protected health information (“PHI”) as defined by 45 C.F.R. §§ 160.103.

3. HIPAA and its implementing regulations prohibit “covered entities,” including medical care providers, from disclosing PHI in judicial proceedings other than by authorization or qualified protective order. 45 C.F.R. § 164.512(e).

4. In order to protect Plaintiff’s confidential and personal records, pursuant to 45 C.F.R. § 160.103 and 164, the parties respectfully request that this Court enter a Qualified Protective Order so that plaintiff’s medical records and related medical information may be obtained.

5. In accordance with Your Honors standing order, the proposed qualified protective order has been emailed to [Proposed\\_Order\\_Ellis@ilnd.uscourts.gov](mailto:Proposed_Order_Ellis@ilnd.uscourts.gov) contemporaneously with the filing this motion.

Wherefore, Defendants, COOK COUNTY SHERIFF THOMAS DART, COUNTY OF COOK, and Plaintiff, JOHNATHAN LACY, respectfully request that this Court enter the Qualified Protective Order on behalf of the Plaintiff.

Respectfully submitted,

*/s/ Troy S. Radunsky*  
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Attorneys for Defendants  
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312-300-4484

*/s/ Nicholas D. Standiford*  
\_\_\_\_\_  
Attorneys for Plaintiff  
Mr. Ronald S. Cope  
Mr. Nicholas D. Standiford  
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Schain Banks  
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Chicago, IL 60602

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that he electronically filed the foregoing document on February 14, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

\_\_\_\_\_  
*/s/ Troy S. Radunsky*  
Troy S. Radunsky, One of the Attorneys  
For the Defendants

**PLAINTIFF'S COUNSEL**

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